UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE

LEWIS COSBY, ERIC MONTAGUE, and MARTIN ZIESMAN, as Co-Trustee for the Carolyn K. Ziesman Revocable Trust, on behalf of themselves and all others similarly situated,

Case No. 3:16-cv-121-TAV-DCP

Plaintiffs,

v.

KPMG LLP,

Defendant.

LEAD PLAINTIFFS' AND CLASS REPRESENTATIVES' NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF **CLASS ACTION SETTLEMENT**

Plaintiffs Lewis Cosby, Eric Montague, and Martin Ziesman, as Co-Trustee for the Carolyn K. Ziesman Revocable Trust, move the Court, in Courtroom 4 of the Howard H. Baker, Jr. United States Courthouse, 800 Market Street, Knoxville, Tennessee, at a date and time to be set by the Court, for an order: (i) preliminary approving the class action settlement; (ii) approving the form and manner of notice to Class Members; and (iii) scheduling a Fairness Hearing on final approval of the Settlement and Lead Counsel's motion for an award of attorneys' fees and reimbursement of Lead Counsel's and Plaintiffs' Litigation Expenses.

This Motion is based upon the accompanying Memorandum of Law in Support of Lead Plaintiffs' and Class Representatives' Unopposed Motion for Preliminary Approval of Class Action Settlement and the supporting Declaration of Laura H. Posner.

Respectfully submitted,

/s/ Laura H. Posner

Laura H. Posner

Date: March 14, 2022

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